



Mr. Michael Berkoff  
Remedial Project Manager  
U.S. EPA Superfund Division/Region 5  
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#### ENVIRONMENT

Subject:  
Willow Boulevard/A-Site Groundwater Monitoring Program  
Kalamazoo, Michigan

Dear Mr. Berkoff:

Georgia-Pacific, LLC (Georgia-Pacific) and ARCADIS, on behalf of Georgia-Pacific, have recently engaged with the Michigan Department of Environmental Quality (MDEQ) and the U.S. Environmental Protection Agency (USEPA) regarding post-closure monitoring requirements for the Willow Boulevard/A-Site Operable Unit (WB/A OU) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site). In a September 13<sup>th</sup> conference call and at a October 22, 2012 meeting in Lansing, ARCADIS presented options for demonstrating compliance with Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, Part 201 (Part 201), in particular a finding of *de minimis* potential contribution of PCB at the groundwater surface water interface (GSI) adjacent to the WB/A OU. ARCADIS also described proposed performance monitoring activities to comply with the Record of Decision and Consent Decree for the WB/A OU. The available data and the hypothetical PCB discharge estimates demonstrate that the WB/A OU has a *de minimis* effect on the groundwater-surface water interface with respect to polychlorinated biphenyls (PCBs).

We are awaiting concurrence from MDEQ with our view that the WB/A OU is a *de minimis* situation with respect to potential PCB influences at the GSI and in the Kalamazoo River. With MDEQ's concurrence, we will then submit a request for a formal determination that Part 201 requirements have been met by the *de minimis* demonstration.

Under the current Part 201 rules, the extensive Vertical Aquifer Sampling (VAS) characterization of the upper aquifer previously requested by MDEQ is not necessary, or warranted in this case. We look forward to discussing an appropriate approach to design and installation of a groundwater monitoring well network.

At the request of MDEQ, with this letter we provide available hydrogeologic information for the WB/A OU that is relevant to selection of monitoring well screen depth intervals near the groundwater surface:

Date:  
December 6, 2012

Contact:  
Patrick N. McGuire

Phone:  
315.671.9233

Email:  
[Pat.McGuire@arcadis-us.com](mailto:Pat.McGuire@arcadis-us.com)

Our ref:  
B0064581.0003.00672

866 203 7023  
317 547 8225

Hydrogeologic Information

Hydrogeologic data available for the site support an understanding that groundwater flow in the shallow aquifer above the silt unit is dominated by lateral flow from upland areas toward the river.

- Attachment 1 – *Cross Section Location Map* – presents locations of wells and borings used to develop the cross-sectional groundwater flow diagrams that are presented in Attachment 2.
- Attachment 2 – *Cross Sections B-B', C-C', and D-D'* – present geology and groundwater flow diagrams from the upland to the river, through the Willow Boulevard and A-Site disposal areas, respectively. The flow diagrams indicate predominant horizontal groundwater flow beneath the disposal areas toward the river. These diagrams support a monitoring well network design that focuses on shallow groundwater.
- Attachment 3 – *Logs for Soil Borings and Monitoring Wells at WB/A OU* – reference detailed descriptions of site geology and well screen depth intervals.
- Attachment 4 – *Parker-Hannifin Horizontal Plume Maps* – figures showing monitoring well locations and TCE and cis-1,2-DCE groundwater plumes associated with Parker-Hannifin facility. The groundwater plume extends from the Parker-Hannifin site approximately 1 mile north to the WB/A OU. The figures, which also show depth of impact to groundwater, demonstrate lateral groundwater flow to the river.
- Attachment 5 – *Log for Parker-Hannifin Monitoring Well Cluster GS-MW-OFF-10(S, M, D)* – well cluster located along Willow Boulevard between Lamont and Willis avenues. Clustered wells are installed to depths of approximately 20, 38, and 72 feet below ground surface (bgs). The boring log for this location shows a good correlation with the WB/A OU site geology as mapped from soil borings, and extends quite a bit deeper to bedrock at 74 feet bgs. The deepest well in the cluster is screened below a confining silt unit that separates shallow and deep aquifers.
- Attachment 6 – *Historical Measurements of Groundwater Levels at Parker-Hannifin Monitoring Well Cluster GS-MW-OFF-10(S, M, D)* – data indicate that a neutral to slightly downward vertical gradient typically exists in the shallow aquifer above the confining silt unit at this location upgradient of the WB/A OU. At this well cluster, detections of vinyl chloride and several other volatile compounds are observed only in the intermediate depth (M) well, which is screened approximately 38 feet below the water table. Given the 1 mile distance from the Parker-Hannifin property, these data are consistent with the WB/A OU site conceptual model in which groundwater flow is predominated by lateral flow toward the river. The water elevation data for the deep aquifer, represented by

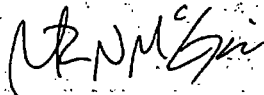
Monitoring Well GS-MW-OFF-10D, indicate there is an upward gradient between the deep and shallow aquifers.

- Attachment 7 – *A-Site Sheetpile Design Drawings* – drawings detailing the alignment and design elevations of the sheetpile wall at A-Site relative to the edge of the disposal area and the approximate median and 100-year flood elevations of the river. The sheetpile bottom (737 ft AMSL) may be of use in considering design of the groundwater monitoring network.

With the information provided herein and in previous reports, meetings, and presentations, we reiterate our request for USEPA's and MDEQ's feedback on our demonstration that PCB in groundwater presents a *de minimis* effect on the Kalamazoo River, consistent with Part 201. As discussed during our April 2012 meeting, GP is willing to perform an appropriate VAS program for purposes of selecting groundwater monitoring well screen depths – focused the shallow aquifer zones most likely to intersect groundwater flow paths in close proximity to the bottom of the landfill. We see no technical basis or need to pursue deeper zones, not only based on the available site data but also in consideration of the *de minimus* condition with respect to PCBs. We are interested in hearing the agencies' thoughts on what level of effort is needed in this regard prior to our planned December 19<sup>th</sup> meeting in Kalamazoo. We are hopeful we can agree upon the basic components of the groundwater monitoring network construction and analytical program at our planned meeting. Should you have any questions relating to the information presented or if ARCADIS can provide any additional assistance, please feel free to call me at 312.671.9233 or Garry Griffith at 734.735.0780 at your convenience.

Sincerely,

ARCADIS of New York, Inc.



Patrick N. McGuire  
Project Coordinator/Principal Environmental Engineer

Attachments (7)

Copies:

Michael Berkoff, USEPA  
John Bradley, MDEQ  
Anne Couture, MDEQ  
Daria Devantier, MDEQ  
Steven Hoin, MDEQ  
David Kline, MDEQ  
Kristi Zakrzewski, MDEQ  
Jeff Keiser, CH2M HILL

**ARCADIS**

Mr. Michael Berkoff  
December 6, 2012

Garry Griffith, Georgia-Pacific  
Michael Erickson, ARCADIS  
Daniel O'Neill, ARCADIS



**ARCADIS**

Mr. Michael Berkoff  
December 6, 2012

Blind Courtesy Copies:

Lisa Coffey, ARCADIS

Douglas K. Cowin, ARCADIS



**Attachment 1**

**Cross Section Location Map**





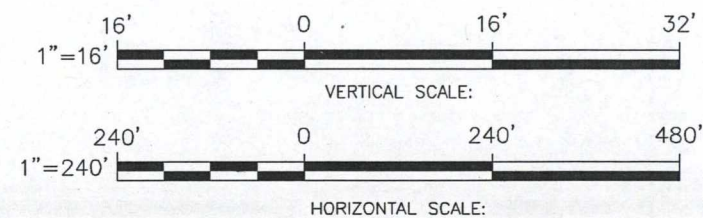




## **Attachment 2**

**Cross Sections B-B', C-C', D-D'**

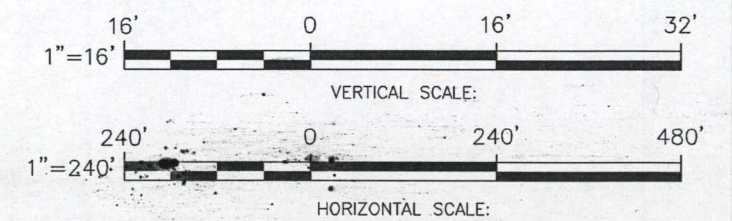




**ARCADIS**

FIGURE  
**2**

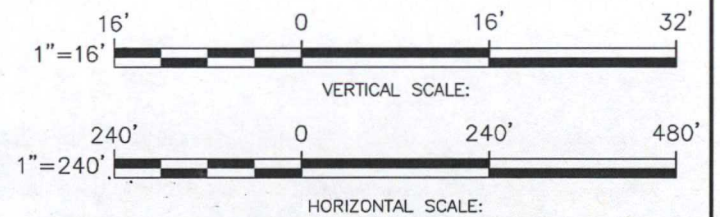




**GEOLOGIC CROSS-SECTION C-C'  
WITH GROUNDWATER FLOW NET  
NOVEMBER 10, 2000**







**GEOLOGIC CROSS-SECTION D-D'  
WITH GROUNDWATER FLOW NET  
NOVEMBER 10, 2000**

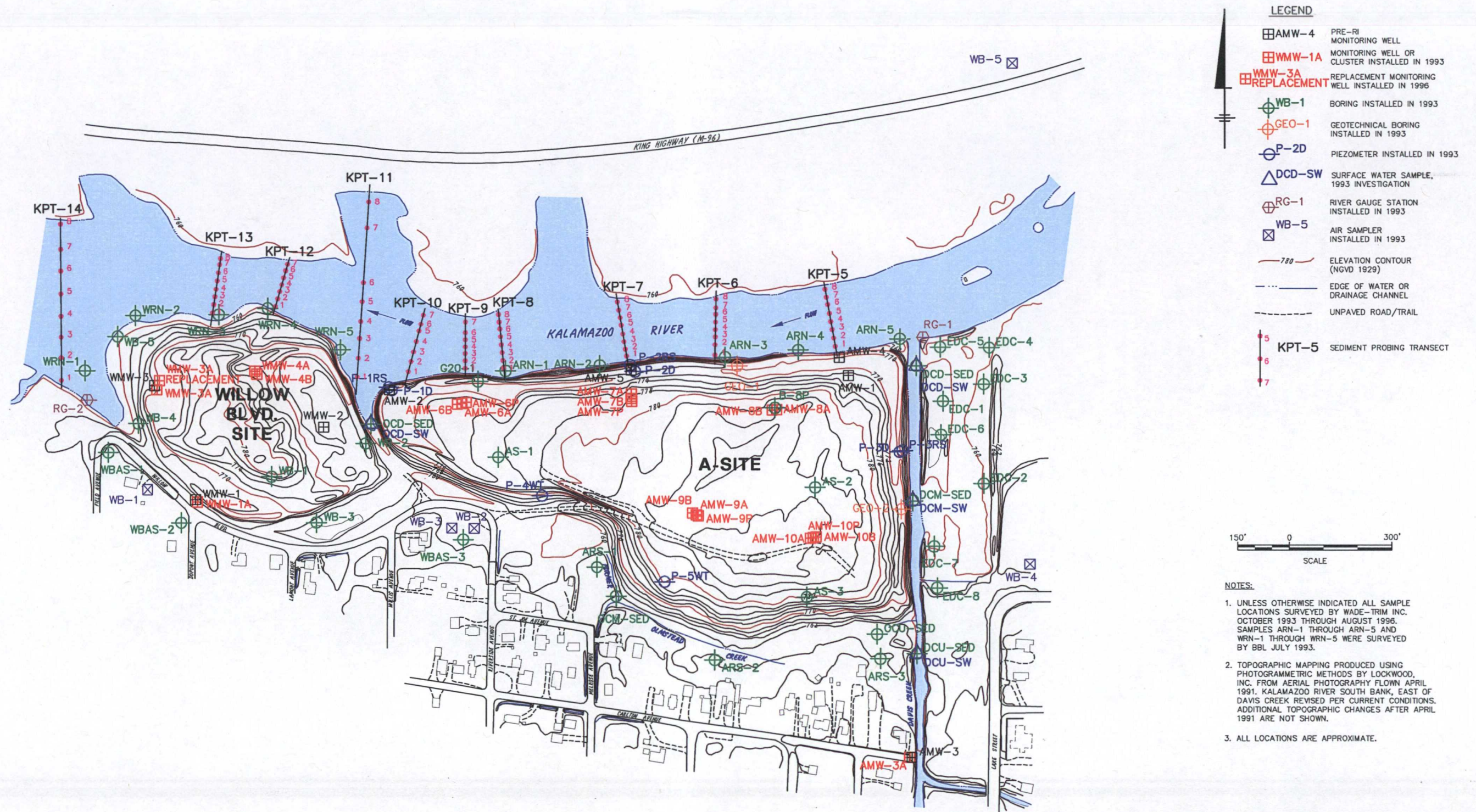




### **Attachment 3**

**Logs for Soil Borings and  
Monitoring Wells at WB/A OU**





KALAMAZOO RIVER STUDY GROUP  
ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SUPERFUND SITE  
REMEDIAL INVESTIGATION/FOCUSED FEASIBILITY STUDY  
WILLOW BOULEVARD/A-SITE OU

## SAMPLE LOCATIONS (PRE-RI TO 1996)

FIGURE  
4



**Georgia-Pacific LLC**  
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**

**Groundwater Elevations at Parker Hannifin Well Cluster on Willow Boulevard**

Date	GS-MW-OFF-10S			GS-MW-OFF-10M			GS-MW-OFF-10D			Difference Between 10S & 10M Elevation (feet)	Vertical Gradient Between 10S & 10M (ft/ft)
	TOC Elevation (feet)	Depth to Water (feet)	Water Level Elevation (feet)	TOC Elevation (feet)	Depth to Water (feet)	Water Level Elevation (feet)	TOC Elevation (feet)	Depth to Water (feet)	Water Level Elevation (feet)		
9/23/05	760.51	3.69	756.82	760.52	3.81	756.71	760.52	2.61	757.91	-0.11	-0.006
1/16/06	760.51	2.00	758.51	760.52	2.16	758.36	760.52	0.50	760.02	-0.15	-0.008
5/15/06	760.51	2.80	757.71	760.52	1.34	759.18	760.52	0.00	760.52	1.47	0.080
9/11/06	760.51	3.10	757.41	760.52	3.24	757.28	760.52	1.58	758.94	-0.13	-0.007
1/22/07	760.51	1.40	759.11	760.52	1.48	759.04	760.52	0.00	760.52	-0.07	-0.004
7/16/07	760.51	3.75	756.76	760.52	3.82	756.70	760.52	2.20	758.32	-0.06	-0.003
1/28/08	760.51	1.73	758.78	760.52	1.79	758.73	760.52	0.00	760.52	-0.05	-0.003
9/3/08	760.51	3.63	756.88	760.52	3.70	756.82	760.52	1.78	758.74	-0.06	-0.003
3/24/09	760.51	1.12	759.39	760.52	1.12	759.40	760.52	0.00	760.52	0.01	0.001
9/21/09	760.51	2.96	757.55	760.52	3.03	757.49	760.52	1.52	759.00	-0.06	-0.003
3/22/10	760.51	1.48	759.03	760.52	1.52	759.00	760.52	0.00	760.52	-0.03	-0.002
12/15/10	760.51	2.48	758.03	760.52	2.53	757.99	760.52	1.22	759.30	-0.04	-0.002
12/20/10	760.51	--	--	760.52	2.73	757.79	760.52	1.44	759.08	--	--
6/7/11	760.51	--	--	760.52	1.02	759.50	760.52	0.00	760.52	--	--
8/30/11	760.51	0.88	759.63	760.52	2.91	757.61	760.52	1.29	759.23	-2.02	-0.110
3/26/12	760.51	1.75	758.76	760.52	1.71	758.81	760.52	0.90	759.62	0.05	0.003

**Notes:**

A negative vertical gradient indicates a downward flow potential.

The separation between the mid-point of the S & M well screens is 18.3 feet.

Data provided in May 9, 2012 email from Geosyntec to Doug Cowin.

The depth of monitoring well GS-MW-OFF-10S is 19.5 feet, the depth of GS-MW-OFF-10M is 37.8 feet, and the depth of GS-MW-OFF-10D is 72.3 feet.



**Attachment 7**

**A-Site Sheetpile Design Drawings**



# **GEORGIA-PACIFIC CORPORATION WILLOW BOULEVARD / A-SITE OPERABLE UNIT A-SITE EROSION CONTROL SYSTEM CONSTRUCTION CERTIFICATE KALAMAZOO, MICHIGAN**

**PREPARED FOR: GEORGIA-PACIFIC CORPORATION  
KALAMAZOO, MICHIGAN**

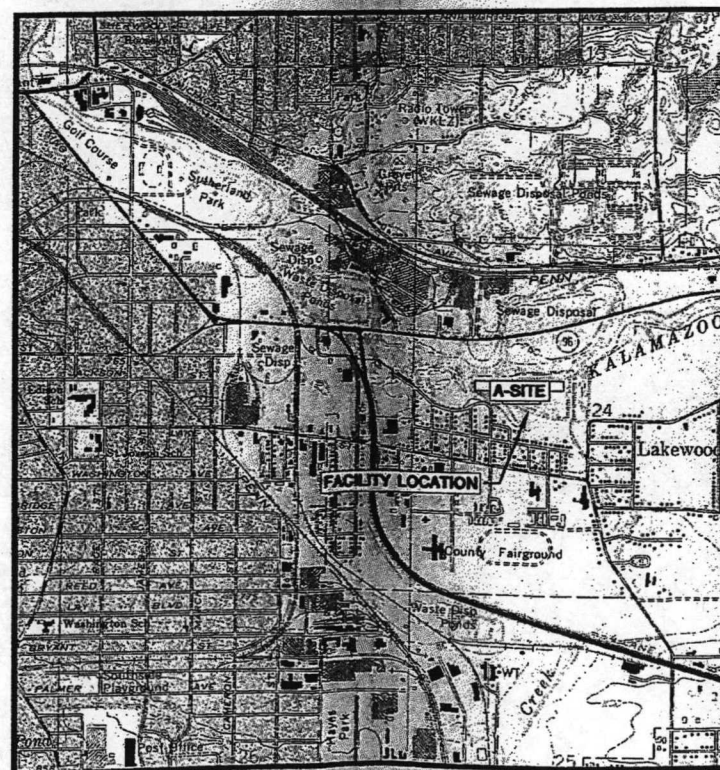
**PREPARED BY: RMT, INC., MICHIGAN  
ANN ARBOR, MICHIGAN**

**DATE: AUGUST 1998**



KALAMAZOO COUNTY

**MICHIGAN STATE MAP**



SITE LOCATION MAP DEVELOPED FROM THE KALAMAZOO, MICHIGAN  
7.5 MINUTE U.S.G.S. TOPOGRAPHIC QUADRANGLE MAP, DATED 1967,  
PHOTO REVISED 1973.

**SITE LOCATION MAP**

## **DRAWING INDEX**

<b>SHEET NO.</b>	<b>SHEET TITLE</b>
1	INDEX / TITLE SHEET
2	EXISTING CONDITIONS
3	SHEETPILE WALL PLAN AND PROFILE
4	DETAILS
5	DETAILS
6	DETAILS

NOTE: THESE PLANS ARE ACCOMPANIED BY SPECIFICATIONS OF THE SAME  
TITLE. THESE DOCUMENTS ARE INTERRELATED AND INTENDED  
TO BE USED AND REVIEWED TOGETHER.

NOTE: THE CONTRACTOR SHALL NOTIFY ALL AREA UTILITY COMPANIES  
PRIOR TO COMMENCING WORK ON THIS PROJECT, IN ACCORDANCE  
WITH STATE AND LOCAL REQUIREMENTS.



1143 HIGHLAND DRIVE, SUITE B  
ANN ARBOR, MI 48106-2237  
P.O. BOX 301 48106-0301  
PHONE: 734-971-7080





- LEGEND**
- 780 ELEVATION CONTOUR (NGVD 1929)
  - EDGE OF WATER OR DRAINAGE CHANNEL
  - APPROXIMATE PROPERTY LINE
  - WATER FLOW DIRECTION
  - AMW-6A EXISTING MONITORING WELL LOCATION AND NUMBER
  - P-SWT PIEZOMETER LOCATION LOCATION AND NUMBER

- NOTES**
1. UNLESS OTHERWISE INDICATED ALL SAMPLE LOCATIONS SURVEYED BY WADE - TRIM INC. OCTOBER 1993 THROUGH JANUARY 1994. SAMPLES ARN-1 THROUGH ARN-5 AND WRN-1 THROUGH WRN-5 WERE SURVEYED BY BLASLAND, BOUCK & LEE, INC. JULY 1993
  2. TOPOGRAPHIC MAPPING PRODUCED USING PHOTOGRAMMETRIC METHODS BY LOCKWOOD, INC. FROM AERIAL PHOTOGRAPHY FLOWN APRIL 1991. TOPOGRAPHIC CHANGES AFTER APRIL 1991 ARE NOT SHOWN.
  3. PROPERTY LINE SURVEYED BY ATWELL - HICKS, INC. JANUARY 1998.

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5.				
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3.				
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1.				
NO.	BY	DATE	REVISION	APP'D.

**GEORGIA-PACIFIC CORPORATION**  
**WILLOW BOULEVARD / A-SITE OPERABLE UNIT**  
**A-SITE EROSION CONTROL SYSTEM**

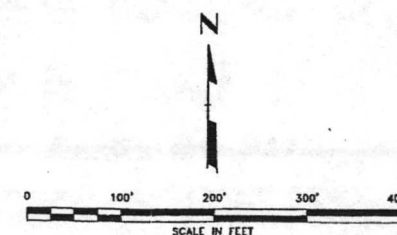
**EXISTING CONDITIONS**

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CHECKED BY: FBM	DATE PRINTED:	FILE NO. 0352.DWG
APPROVED BY:		
DATE: AUGUST 1988		

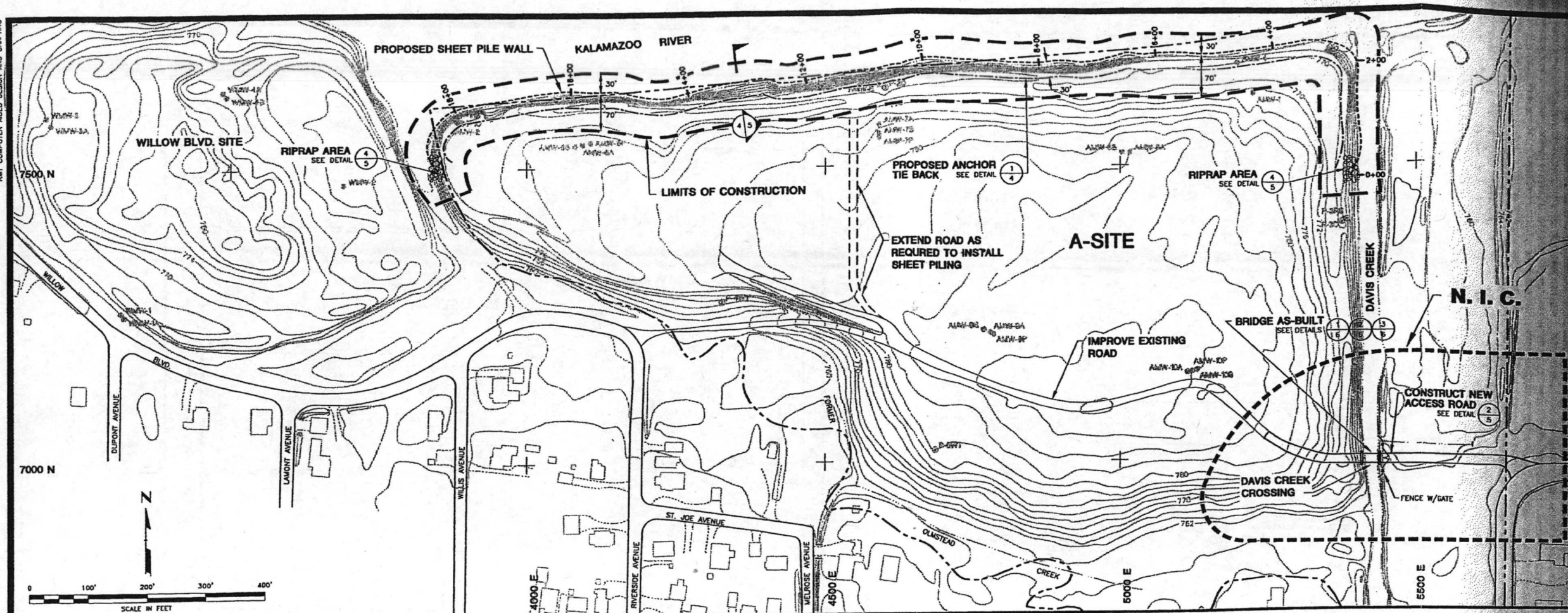
**SHEET 2 of 6**

1143 HIGHLAND DRIVE, SUITE B  
 ANN ARBOR, MI 48106-2237  
 P.O. BOX 991 48108-0991  
 PHONE: 734-771-7080  
 FAX: 734-771-9022

**RMT**



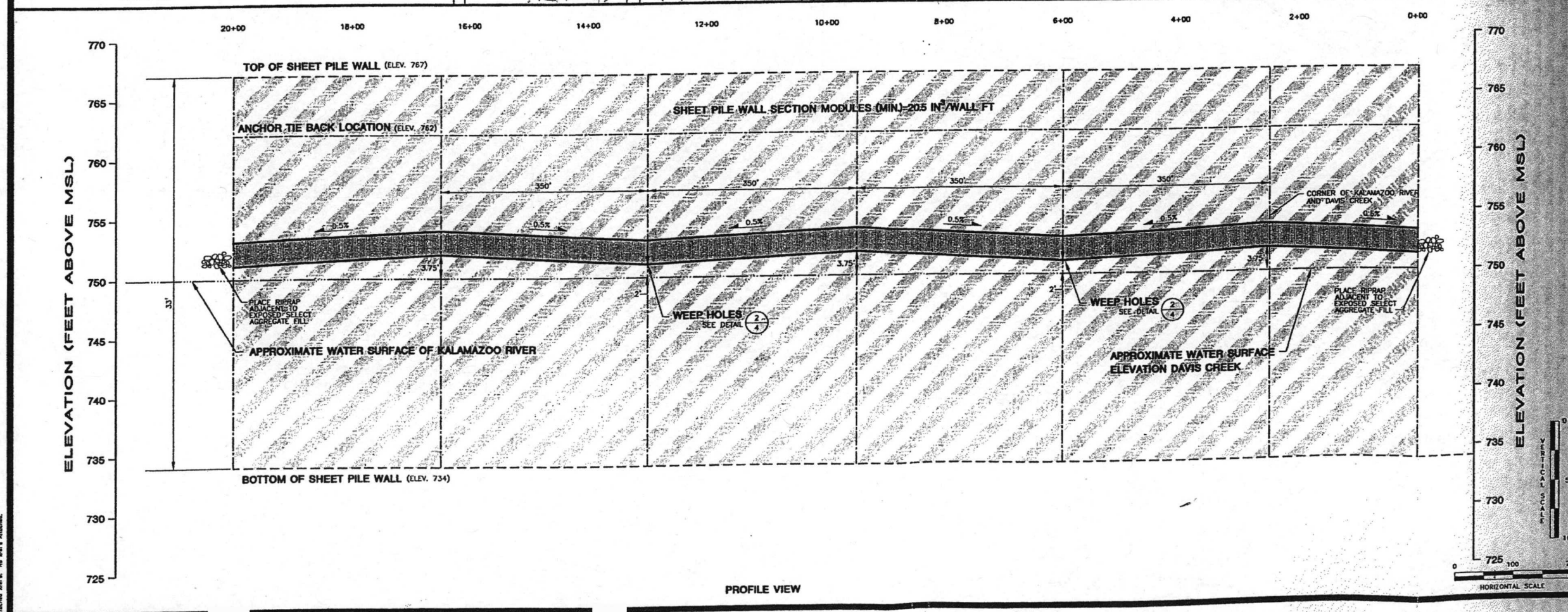




**LEGEND**

---	APPROXIMATE PROPERTY LINE
---	EXISTING 2 FOOT CONTOUR
---	EXISTING 10 FOOT CONTOUR
---	EXISTING SHORE LINE
+	MONITORING WELL LOCATION AND NUMBER
+	PIEZOMETER LOCATION AND NUMBER
---	PROPOSED ANCHOR TIE BACK
---	PROPOSED SHEET PILE WALL
---	FLOW DIRECTION
---	LIMITS OF CONSTRUCTION
---	BUILDING
---	RIPRAP AREA
---	SELECT AGGREGATE FILL

- NOTES**
1. UNLESS OTHERWISE INDICATED ALL SAMPLE LOCATIONS SURVEYED BY WACE-TFM INC. OCTOBER 1993 THROUGH JANUARY 1994. SAMPLES APR-1 THROUGH APR-5 AND WRN-1 THROUGH WRN-5 WERE SURVEYED BY ELASLAND, BOUCK & LEE, INC. JULY 1993.
  2. TOPOGRAPHIC MAPS PRODUCED USING PHOTOGRAMMETRIC METHODS BY LOCKWOOD, INC. FROM AERIAL PHOTOGRAPHY DATED APRIL 1991. TOPOGRAPHIC CHANGES AFTER APRIL 1991 ARE NOT SHOWN.
  3. THE GRID SYSTEM IS TRUNCATED STATE PLANE COORDINATES. ACTUAL STATE PLANE COORDINATES ARE 1280000 GREATER FOR THE EASTING AND 288000 GREATER FOR THE NORTING SHOWN ON THIS SHEET. LA 7500N IS 287500N AND 5000E IS 1280500E IN THE STATE PLANE COORDINATE SYSTEM.
  4. CONTRACTOR TO PROTECT EXISTING MONITORING WELLS AND PIEZOMETERS.
  5. MAXIMUM SLOPE GRADE ON EXTERIOR SLOPE IS 2H:1V.
  6. FINAL PLAN LOCATION OF SHEETPILE TO BE DETERMINED IN THE FIELD.



**NOTE: THESE PLANS ARE ACCOMPANIED BY SPECIFICATIONS OF THE SAME TITLE. THESE DOCUMENTS ARE INTERRELATED AND INTENDED TO BE USED AND REVIEWED TOGETHER.**

**NOTE: THE CONTRACTOR SHALL NOTIFY ALL AREA UTILITY COMPANIES PRIOR TO COMMENCING WORK ON THIS PROJECT, IN ACCORDANCE WITH STATE AND LOCAL REQUIREMENTS.**

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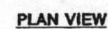
**GEORGIA-PACIFIC CORPORATION**  
**WILLOW BOULEVARD / A-SITE OPERABLE UNIT**  
**A-SITE EROSION CONTROL SYSTEM**

**SHEETPILE WALL PLAN AND PROFILE**

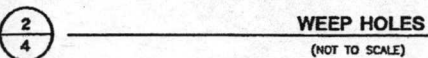
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APPROVED BY:		<b>SHEET 3 of 6</b>
DATE: AUGUST 1998		

1143 HIGHLAND DRIVE, SUITE B  
 ANN ARBOR, MI. 48106-2237  
 PHONE: 734-971-7000  
 FAX: 734-971-9022





**BULKHEAD TIE-BACK**  
(NOT TO SCALE)



- NOTES FOR SHEET PILE AND TIE BACK CONSTRUCTION

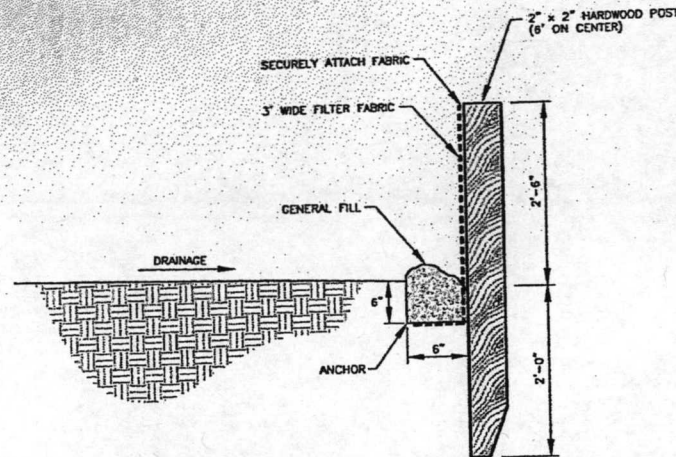
1. CONTRACTOR SHALL SUBMIT PROPOSED SEQUENCE OF CONSTRUCTION FOR SHEET PILE AND THE BACK ANCHOR INSTALLATION.
2. CONTRACTOR SHALL SUBMIT DETAILS FOR PROPOSED SHEET PILE MATERIALS.
3. CONTRACTOR SHALL SUBMIT DETAILS FOR PROPOSED THE BACK SYSTEM INCLUDING  
WATER  
CONNECTION DETAILS  
THE ROD OR BAR DIMENSIONS  
SPICE DETAILS FOR WALER AND THE ROD/BAR  
PROTECTIVE COATING FOR ALL BURIED STEEL.
4. TRENCH FOR CONCRETE ANCHOR SHALL BE EXCAVATED INTO UNDISTURBED SOIL AS APPROVED. REINFORCING SHALL BE CONTINUOUS THROUGH ANY JOINTS BETWEEN POURS.



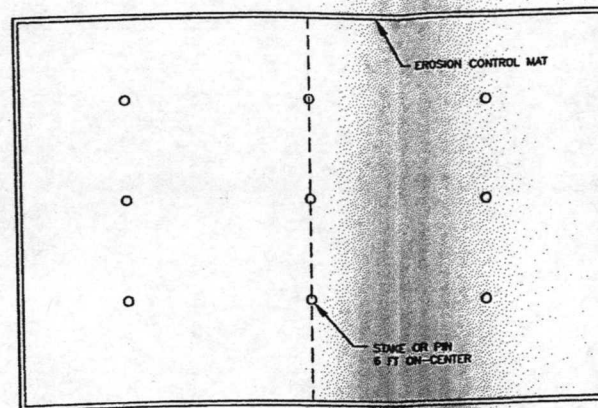
(NOT TO SCALE)

1143 HIGHLAND DRIVE, SUITE B  
ANN ARBOR, MI. 48108-2237  
P.O. BOX 991 48106-0991  
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FAX: 734-971-9022



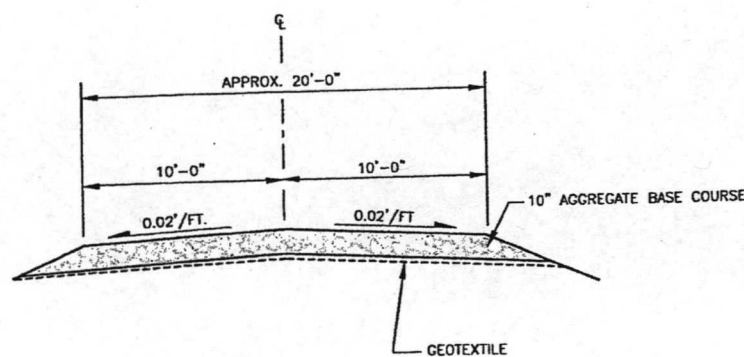


1  
5 SEDIMENT CONTAINMENT FENCE  
(NOT TO SCALE)

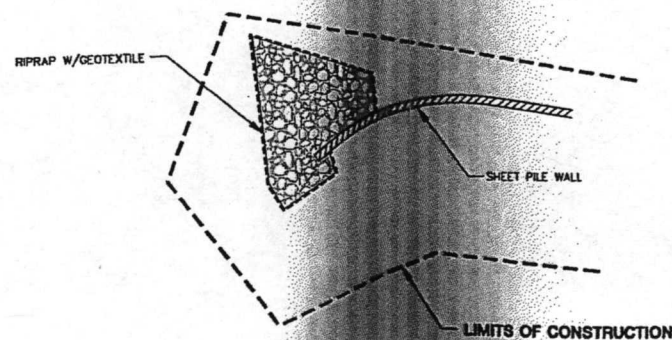


NOTE: PLACE EROSION CONTROL MAT ON THE PROPOSED GROUND SURFACE BETWEEN SHEET PILE WALL AND TOP OF SLOPE

3  
5 EROSION CONTROL MAT  
(NOT TO SCALE)



2  
5 ACCESS ROAD  
(NOT TO SCALE)



4  
5 PLAN VIEW ON END OF SHEET PILE WALL  
(NOT TO SCALE)

NOTE: THESE PLANS ARE ACCOMPANIED BY SPECIFICATIONS OF THE SAME TITLE. THESE DOCUMENTS ARE INTERRELATED AND INTENDED TO BE USED AND REVIEWED TOGETHER.

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GEORGIA-PACIFIC CORPORATION  
WILLOW BOULEVARD / A-SITE OPERABLE UNIT  
A-SITE EROSION CONTROL SYSTEM

DETAILS

DRAWN BY: LUCIOOS	SCALE:	PROJECT NO. 4017.03
CHECKED BY: FBM	NTS	FILE NO. 0355.DWG
APPROVED BY:	DATE PRINTED:	
DATE: AUGUST 1998		Sheet 5 of 6

**RMT** INC., MEMPHIS  
1143 HIGHLAND DRIVE, SUITE B  
ANN ARBOR, MI 48106-2237  
P.O. BOX 591 48106-0591  
PHONE: 734-971-7080  
FAX: 734-971-9522